

The Law Offices of Jacob Aronauer
225 Broadway, 3rd Floor
New York, New York 10007
(212) 323-6980
jaronauer@aronauerlaw.com

November 25, 2022

Via ECF

Hon. Paul Engelmayer
Thurgood Marshall
40 Foley Square
New York, NY 10007

Re: Sanchez v. E.I.G. Auto Salvage, Inc. et al
1:21-cv-08266

Dear Judge Engelmayer:

This office represents Plaintiff in the above captioned matter. Plaintiff requests permission to submit an addition to the pre-trial joint order. A redlined copy of the proposed amended joint pre-trial order and a clean copy is annexed. Defendants graciously consent to Plaintiff's request.

As the Court is aware, the pre-trial joint order was due and submitted on November 23, 2022. Shortly after submitting the joint pre-trial order, I realized that Plaintiff needed to include additional exhibits. These documents include correspondence between Plaintiff and Rony Baez and correspondence between Plaintiff and Jorge Enrique Uruizo Deza. On March 23, 2022, these documents (accompanying this letter) were provided to Defendants' former counsel. It appears, from my recent correspondence with Defendants' current counsel, that they were not aware of these documents.

The prejudice to Defendants' counsel is non-existent because all Spanish correspondence (including the ones at issue) have yet to be jointly translated into Spanish. At Defendants' request, we have agreed to use a translator that Defendants' counsel has previously worked with and trusts. My understanding is that the translator will provide these documents by December 7, 2022. Thus, since the documents have not yet been translated, Defendants cannot claim prejudice.

To further ensure that Defendants will not be prejudiced, Plaintiff is willing to permit Defendants' counsel to depose Plaintiff with respect to these documents even though they were previously produced to Defendants counsel. Furthermore, Plaintiff will make himself available to be deposed on any of the following dates: Dec. 12, 13, 15, 19 and 20th. These dates are after the Spanish translation is to be completed.

The above rectifies any potential prejudice to Defendants.

Respectfully

/s Jacob Aronauer
Jacob Aronauer
Attorney for Plaintiff

Via ECF

All attorneys on Record

Granted. The parties shall submit an updated joint pretrial order by November 30, 2022, and, per the Court's November 4, 2022 order, *see* Dkt. 69, shall submit responses to the motions *in limine* by December 2, 2022. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
November 28, 2022